## Exhibit 2

S&C Draft of June 18, 2025 CONFIDENTIAL

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FTX TRADING LTD., et al.,1	Case No. 22-11068 (KBO)
Debtors.	(Jointly Administered)
	Ref. No
In re:	Chapter 11
ALAMEDA GLOBAL SERVICES LTD.,	Case No. 22-11134 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
ALAMEDA RESEARCH (BAHAMAS) LTD,	Case No. 22-11105 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No
ALAMEDA RESEARCH HOLDINGS INC,	Case No. 22-11069 (KBO)
Debtor.	(Jointly Administered)
To	Ref. No
In re:	Chapter 11

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

ALAMEDA RESEARCH KK,	Case No. 22-11106 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
ALAMEDA RESEARCH LTD,	Case No. 22-11067 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
ALAMEDA RESEARCH LLC,	Case No. 22-11066 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
ALAMEDA RESEARCH YANKARI LTD,	Case No. 22-11108 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
ALAMEDA TR LTD,	Case No. 22-11078 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
ALAMEDA TR SYSTEMS S. DE R. L.,	Case No. 22-11109 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
ALLSTON WAY LTD,	Case No. 22-11079 (KBO)
Debtor.	(Jointly Administered)

	Ref. No.
In re:	Chapter 11
ATLANTIS TECHNOLOGY LTD.,	Case No. 22-11081 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
BANCROFT WAY LTD,	Case No. 22-11082 (KBO)
Debtor.	(Jointly Administered)
<u></u>	Ref. No.
In re:	Chapter 11
BLOCKFOLIO, INC.,	Case No. 22-11110 (KBO)
Debtor.	(Jointly Administered)
	Ref. No
In re:	Chapter 11
BLUE RIDGE LTD,	Case No. 22-11083 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
CARDINAL VENTURES LTD,	Case No. 22-11084 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
CEDAR BAY LTD,	Case No. 22-11085 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
CEDAR GROVE TECHNOLOGY SERVICES,	Case No. 22-11162 (KBO)

LTD.,	
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
in ie.	Chapter 11
CLIFTON BAY INVESTMENTS LLC,	Case No. 22-11070 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
CLIFTON BAY INVESTMENTS LTD,	Case No. 22-11111 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
COTTONWOOD GROVE LTD,	Case No. 22-11112 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
COTTONWOOD TECHNOLOGIES LTD,	Case No. 22-11136 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
CRYPTO BAHAMAS LLC,	Case No. 22-11113 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
DECK TECHNOLOGIES HOLDINGS LLC,	Case No. 22-11138 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.

In re:	Chapter 11
DECK TECHNOLOGIES INC.,	Case No. 22-11139 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
DEEP CREEK LTD,	Case No. 22-11114 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
DIGITAL CUSTODY INC.,	Case No. 22-11115 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
EUCLID WAY LTD,	Case No. 22-11141 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
FTX (GIBRALTAR) LTD,	Case No. 22-11116 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
FTX CANADA INC,	Case No. 22-11117 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
FTX DIGITAL ASSETS LLC,	Case No. 22-11143 (KBO)

Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
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FTX DIGITAL HOLDINGS (SINGAPORE) PTE LTD,	Case No. 22-11118 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
FTX EMEA LTD.,	Case No. 22-11145 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
FTX EQUITY RECORD HOLDINGS LTD,	Case No. 22-11099 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
FTX EUROPE AG,	Case No. 22-11075 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
FTX HONG KONG LTD,	Case No. 22-11101 (KBO)
Debtor.	(Jointly Administered)
	Ref. No
In re:	Chapter 11
FTX LEND INC.,	Case No. 22-11167 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11

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FTX MARKETPLACE, INC.,	Case No. 22-11168 (KBO)
Debtor.	(Jointly Administered)
<del></del>	Ref. No.
In re:	Chapter 11
FTX PROPERTY HOLDINGS LTD,	Case No. 22-11076 (KBO)
Debtor.	(Jointly Administered)
	Ref. No
In re:	Chapter 11
FTX SERVICES SOLUTIONS LTD.,	Case No. 22-11120 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
FTX US SERVICES, INC.,	Case No. 22-11171 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
FTX US TRADING, INC.,	Case No. 22-11149 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
FTX VENTURES LTD,	Case No. 22-11172 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
FTX ZUMA LTD.,	Case No. 22-11124 (KBO)
Debtor.	(Jointly Administered)

	D. C.M.
In re:	Ref. No Chapter 11
GG TRADING TERMINAL LTD,	Case No. 22-11173 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
GLOBAL COMPASS DYNAMICS LTD.,	Case No. 22-11125 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
GOOD LUCK GAMES, LLC,	Case No. 22-11174 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
GOODMAN INVESTMENTS LTD.,	Case No. 22-11126 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
HANNAM GROUP INC,	Case No. 22-11175 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
HAWAII DIGITAL ASSETS INC.,	Case No. 22-11127 (KBO)
Debtor.	(Jointly Administered)
	Ref. No
In re:	Chapter 11

HILLTOP TECHNOLOGY SERVICES LLC,	Case No. 22-11176 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
HIVE EMPIRE TRADING PTY LTD,	Case No. 22-11150 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
ISLAND BAY VENTURES INC.,	Case No. 22-11129 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
KILLARNEY LAKE INVESTMENTS LTD,	Case No. 22-11131 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
LP BITCOIN YIELD ENHANCEMENT FUND SUCCESSOR, LLC (F/K/A LEDGERPRIME BITCOIN YIELD ENHANCEMENT FUND, LLC),  Debtor.	Case No. 22-11177 (KBO) (Jointly Administered) Ref. No
In re:	Chapter 11
LEDGERPRIME BITCOIN YIELD ENHANCEMENT MASTER FUND LP, Debtor.	Case No. 22-11155 (KBO) (Jointly Administered) Ref. No
In re:	Chapter 11
LEDGERPRIME VENTURES, LP,	Case No. 22-11159 (KBO)

Debtor.	(Jointly Administered)
	Ref. No
In re:	Chapter 11
LT BASKETS LTD.,	Case No. 22-11077 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
MACLAURIN INVESTMENTS LTD.,	Case No. 22-11087 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
MANGROVE CAY LTD,	Case No. 22-11088 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
NORTH DIMENSION INC.,	Case No. 22-11153 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
NORTH DIMENSION LTD,	Case No. 22-11160 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
NORTH WIRELESS DIMENSION INC.,	Case No. 22-11154 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11

PAPER BIRD INC.,	Case No. 22-11089 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
PIONEER STREET INC.,	Case No. 22-11090 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
QUOINE PTE LTD,	Case No. 22-11161 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
STRATEGY ARK COLLECTIVE LTD.,	Case No. 22-11094 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
TECHNOLOGY SERVICES BAHAMAS	Case No. 22-11095 (KBO)
LIMITED,	(Jointly Administered)
Debtor.	Ref. No.
In re:	Chapter 11
VERDANT CANYON CAPITAL LLC,	Case No. 22-11096 (KBO)
Debtor.	(Jointly Administered)
	Ref. No.
In re:	Chapter 11
WEST INNOVATIVE BARISTA LTD.,	Case No. 22-11097 (KBO)
Debtor.	(Jointly Administered)

In re:	Ref. No Chapter 11
WEST REALM SHIRES FINANCIAL SERVICES INC.,	Case No. 22-11072 (KBO)
Debtor.	(Jointly Administered)  Ref. No.
In re:	Chapter 11
WEST REALM SHIRES INC.,	Case No. 22-11183 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
WEST REALM SHIRES SERVICES INC.,	Case No. 22-11071 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
WESTERN CONCORD ENTERPRISES LTD.,	Case No. 22-11098 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
FTX JAPAN HOLDINGS K.K.,	Case No. 22-11074 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
LH SUCCESSOR INC. (F/K/A LEDGER	Case No. 22-11073 (KBO)
HOLDINGS INC.),	(Jointly Administered)
Debtor.	Ref. No.
In re:	Chapter 11

LEDGER PRIME LLC),	Case No. 22-11158 (KBO)
Debtor.	(Jointly Administered)
In re:	Ref. No Chapter 11
LP DIGITAL ASSET OPPORTUNITIES FUND SUCCESSOR, LLC (F/K/A LEDGERPRIME	Case No. 22-11156 (KBO)
DIGITAL ASSET OPPORTUNITIES FUND, LLC),	(Jointly Administered)
Debtor.	Ref. No
In re:	Chapter 11
LP DIGITAL ASSET OPPORTUNITIES	Case No. 22-11157 (KBO)
MASTER FUND SUCCESSOR LP (F/K/A LEDGERPRIME DIGITAL ASSET	(Jointly Administered)
OPPORTUNITIES MASTER FUND LP),	Ref. No
Debtor.	

# FINAL DECREE (I) CLOSING THE CHAPTER 11 CASES OF THE CONSOLIDATED DEBTORS AND (II) CLOSING THE CHAPTER 11 CASES OF THE SEPARATE SUBSIDIARIES ON THE APPLICABLE CLOSING DATE

Upon the motion (the "Motion")<sup>2</sup> of the FTX Recovery Trust for entry of a final decree (this "Final Decree") pursuant to sections 105(a) and 350(a) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the "Bankruptcy Code"), rule 3022 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and rule 3022-1 of the Local Rules of the United States Bankruptcy Court for the District of Delaware (the "Local Rules"), entering a final decree (i) closing the Chapter 11 Cases of the Consolidated Debtors upon entry of this Final Decree and (ii) closing the Chapter 11 Cases of the Separate Subsidiaries on the applicable

<sup>&</sup>lt;sup>2</sup> Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Motion.

Closing Date; and this Court having jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final decree consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that no other or further notice is necessary; and objections (if any) to the Motion having been withdrawn, resolved or overruled on the merits; and upon the record of all of the proceedings had before this Court; and this Court having found and determined that the relief sought in the Motion is in the best interests of the FTX Recovery Trust, its stakeholders and all other parties-in-interest; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

#### IT IS HEREBY ORDERED THAT:

- 1. The Motion is GRANTED as set forth herein.
- 2. The Chapter 11 Cases of the Debtors listed on the attached <u>Schedule 1</u> (such Debtors, the "<u>Consolidated Debtors</u>") shall be deemed closed as of the date hereof; *provided* that the Court shall retain jurisdiction as provided in Article 14 of the Plan, and entry of this Final Decree is without prejudice to the rights of the FTX Recovery Trust or any party-in-interest to seek to reopen any of the chapter 11 cases listed on <u>Schedule 1</u> for cause pursuant to section 350(b) of the Bankruptcy Code.

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- 3. Following the full administration of each of the Separate Subsidiaries listed on the attached Schedule 2, the Plan Administrator shall file a notice substantially in the form attached hereto as Exhibit A on the docket of these Chapter 11 Cases (such notice, a "Closing Notice") of these Chapter 11 Cases. Upon the filing of If no objections to the Closing Notice; are received by the Plan Administrator within ten (10) days after such Closing Notice is served, the Chapter 11 Case of the applicable Separate Subsidiary shall be deemed closed; provided that the closing of such Chapter 11 Case is without prejudice to the rights of the FTX Recovery Trust or any party-in-interest to seek to reopen such Chapter 11 Case for cause pursuant to section 350(b) of the Bankruptcy Code. If a timely objection to a Closing Notice is received by the Plan Administrator and is not resolved among the parties, the Chapter 11 Case of the applicable Separate Subsidiary shall not be deemed closed absent further order of the Court.
- 4. The Clerk of the Court and other relevant parties are authorized and shall take any actions necessary to update the ECF filing system and their respective records to mark the dockets of the Closing Debtors as "Closed".
- 5. To the extent not already paid, the fees required to be paid to the United States Trustee under 28 U.S.C. § 1930(a) shall be paid by the FTX Recovery Trust on behalf of all closed chapter 11 cases as soon as reasonably practicable after the date of entry of this Final Decree. The FTX Recovery Trust shall not be obligated to pay any fees to the United States Trustee for any Closing Debtors Consolidated Debtors (excluding, for the avoidance of doubt, FTX Recovery Trust, Case No. 22-11068, which shall continue to be obligated to pay such fees) for any period following the entry of this Final Decree. The Separate Subsidiaries shall remain obligated to pay any fees to the United States Trustee for their respective cases through the closing of such cases.

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- 6. This Final Decree is without prejudice to the rights of the FTX Recovery Trust with respect to any and all adversary proceedings and contested matters (or any other actions or proceedings whether ongoing or not yet commenced) regarding claims or causes of actions retained by the FTX Recovery Trust, which may still be commenced, prosecuted and determined according to the terms of the Plan.
- 7. The requirement under Local Rule 3022-1(a)(ii) to file a final report with respect to the Closing Debtors is hereby waived, and the FTX Recovery Trust shall file a consolidated final report, including the information required under Local Rule 3022-1(a) as to each Debtor, along with a motion to close the Lead Case, which will remain open pending further order of this Court.
- 8. The FTX Recovery Trust and the claims agent are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Final Decree.
- 9. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Motion or the implementation of this Final Decree.

Dated:	
Wilmington, Delaware	The Honorable Karen B. Owens
	Chief United States Bankruntcy Judge

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## Schedule 1

#### **Consolidated Debtors**

Entity Name	Case Number
Alameda Global Services Ltd.	22-11134
Alameda Research (Bahamas) Ltd	22-11105
Alameda Research Holdings Inc.	22-11069
Alameda Research KK	22-11106
Alameda Research Ltd	22-11067
Alameda Research LLC	22-11066
Alameda Research Yankari Ltd	22-11108
Alameda TR Ltd	22-11078
Alameda TR Systems S. de R. L.	22-11109
Allston Way Ltd	22-11079
Atlantis Technology Ltd.	22-11081
Bancroft Way Ltd	22-11082
Blockfolio, Inc.	22-11110
Blue Ridge Ltd	22-11083
Cardinal Ventures Ltd	22-11084
Cedar Bay Ltd	22-11085
Cedar Grove Technology Services, Ltd.	22-11162
Clifton Bay Investments LLC	22-11070
Clifton Bay Investments Ltd	22-11111
Cottonwood Grove Ltd	22-11112
Cottonwood Technologies Ltd	22-11136
Crypto Bahamas LLC	22-11113
Deck Technologies Holdings LLC	22-11138
Deck Technologies Inc.	22-11139
Deep Creek Ltd	22-11114
Digital Custody Inc.	22-11115
Euclid Way Ltd	22-11141
FTX (Gibraltar) Ltd	22-11116
FTX Canada Inc	22-11117
FTX Digital Assets LLC	22-11143
FTX Digital Holdings (Singapore) Pte Ltd	22-11118
FTX EMEA Ltd.	22-11145
FTX Equity Record Holdings Ltd	22-11099
FTX Europe AG	22-11075
FTX Hong Kong Ltd	22-11101

FTX Lend Inc.	22-11167
FTX Marketplace, Inc.	22-11168
FTX Property Holdings Ltd	22-11076
FTX Services Solutions Ltd.	22-11120
FTX US Services, Inc.	22-11171
FTX US Trading, Inc.	22-11149
FTX Ventures Ltd	22-11172
FTX Zuma Ltd	22-11124
GG Trading Terminal Ltd	22-11173
Global Compass Dynamics Ltd.	22-11125
Good Luck Games, LLC	22-11174
Goodman Investments Ltd.	22-11126
Hannam Group Inc	22-11175
Hawaii Digital Assets Inc.	22-11127
Hilltop Technology Services LLC	22-11176
Hive Empire Trading Pty Ltd	22-11150
Island Bay Ventures Inc.	22-11129
Killarney Lake Investments Ltd	22-11131
LP Bitcoin Yield Enhancement Fund Successor, LLC f/k/a LedgerPrime Bitcoin Yield Enhancement Fund, LLC	22-11177
LedgerPrime Bitcoin Yield Enhancement Master Fund LP	22-11155
LedgerPrime Ventures, LP	22-11159
LT Baskets Ltd.	22-11077
Maclaurin Investments Ltd.	22-11087
Mangrove Cay Ltd	22-11088
North Dimension Inc.	22-11153
North Dimension Ltd	22-11160
North Wireless Dimension Inc.	22-11154
Paper Bird Inc.	22-11089
Pioneer Street Inc.	22-11090
Quoine Pte Ltd	22-11161
Strategy Ark Collective Ltd.	22-11094
Technology Services Bahamas Limited	22-11095
Verdant Canyon Capital LLC	22-11096
West Innovative Barista Ltd.	22-11097
West Realm Shires Financial Services Inc.	22-11072
West Realm Shires Inc.	22-11183
West Realm Shires Services Inc.	22-11071
Western Concord Enterprises Ltd.	22-11098

## Schedule 2

## **Separate Subsidiaries**

Entity Name	Case Number
FTX Japan Holdings K.K.	22-11074
LH Successor Inc. f/k/a Ledger Holdings Inc.	22-11073
LP Successor Entity LLC f/k/a Ledger Prime LLC	22-11158
LP Digital Asset Opportunities Fund Successor, LLC f/k/a LedgerPrime Digital Asset Opportunities Fund, LLC	22-11156
LP Digital Asset Opportunities Master Fund Successor LP f/k/a LedgerPrime Digital Asset Opportunities Master Fund LP	22-11157

## EXHIBIT BA

**Form of Closing Notice** 

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Ref No.
Debtors.	(Jointly Administered)
FTX TRADING LTD., et al.,1	Case No. 22-11068 (KBO)
In re:	Chapter 11

# NOTICE OF FULL ADMINISTRATION AND CLOSING DATE OF CHAPTER 11 CASE OF [•]

**PLEASE TAKE NOTICE** that on June 4, 2025, the FTX Recovery Trust<sup>2</sup> filed the Motion of the FTX Recovery Trust and the Separate Subsidiaries for Entry Of A Final Decree (I) Closing the Chapter 11 Cases of the Consolidated Debtors and (II) Closing the Chapter 11 Cases of the Separate Subsidiaries on the Applicable Closing Date<sup>3</sup> [D.I. [●]] (the "Motion").

**PLEASE TAKE FURTHER NOTICE** that on [●], 2025, the Court approved the Motion and entered the *Final Decree (I) Closing the Chapter 11 Cases of the Consolidated Debtors and (II) Closing the Chapter 11 Cases of the Separate Subsidiaries on the Applicable Closing Date* [D.I. [●]] (the "Order").

**PLEASE TAKE FURTHER NOTICE** that, as of [●], 2025 (the "Closing Date"), the Chapter 11 Case of [●] (the "Closing Debtor") has been fully administered because:

- a. The Closing Debtor has no prospects of commencing any business activities in the future and has no remaining assets or liabilities;
- b. the Plan Administrator has assumed the management of the property of the Closing Debtor;

The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX.

The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors' (as defined below) confirmed Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates [D.I. 26404-1].

<sup>&</sup>lt;sup>3</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

- c. the Plan Administrator has assumed reconciling all claims associated with the Closing Debtor; and
- d. all contested matters, adversary proceedings and motions concerning the Closing Debtor have either been resolved, will be resolved, or have transferred to the Plan Administrator, resulting in no substantive change to any litigation nor any prejudice to any interested party.

PLEASE TAKE FURTHER NOTICE that objections or responses, if any, to this notice must be filed electronically with on the docket of *In re FTX Trading, Ltd.*, et al., Case No. 22-11068 (KBO), in accordance with Local Rule 5005-4, and must (a) be in writing and state with specificity the basis for objecting; (b) comply with the Bankruptcy Code, Bankruptcy Rules, Local Rules and the Order and (c) be filed with the Court and served (which service may be by email) on counsel to the Plan Administrator, (1) Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Andrew G. Dietderich (dietdericha@sullcrom.com) and Alexa J. Kranzley (kranzleya@sullcrom.com) and (2) Landis Rath & Cobb LLP, 919 N. Market St., Suite 1800, Wilmington, Delaware 19801, Attn: Adam G. Landis (landis@lrclaw.com) and Kimberly A. Brown (brown@lrclaw.com) so as to be received on or before [●] (the "Closing Objection Deadline"). Only those responses or objections that are timely filed, served and received will be considered.

PLEASE TAKE FURTHER NOTICE pursuant to the Order, the Plan Administrator requests that the Court deem that absent order of the Court to the contrary, any party failing to timely file and serve an objection or response before the Closing Objection Deadline in accordance with the Order and this notice shall be forever barred from asserting any objection to closing the Chapter 11 Case of the Closing Debtor-closed as of the Closing Date.

Dated: [●], 2025

Wilmington, Delaware

#### LANDIS RATH & COBB LLP

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SULLIVAN & CROMWELL LLP

Andrew G. Dietderich (admitted *pro hac vice*) James L. Bromley (admitted *pro hac vice*) Brian D. Glueckstein (admitted *pro hac vice*) Alexa J. Kranzley (admitted *pro hac vice*) 125 Broad Street

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Counsel for the FTX Recovery Trust